

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

E. JEAN CARROLL,

Plaintiff,

v.

DONALD J. TRUMP, in his personal capacity,

Defendant.

No. 20 Civ. 7311 (LAK) (JLC)

STIPULATION AND [PROPOSED] ORDER

Pursuant to Your Honor's Individual Rules of Practice, Plaintiff E. Jean Carroll and Defendant Donald J. Trump, by their undersigned counsel and subject to the approval of the Court, enter into the following Stipulation and Proposed Order:

WHEREAS the Court entered a Scheduling Order (Doc No. 76) setting deadlines to govern discovery in this action, including that the parties shall make any and all expert disclosures under Federal Rule of Civil Procedure 26(a)(2) on or before September 16, 2022;

WHEREAS the parties have met and conferred regarding a joint request to extend the deadline to make expert disclosures under Rule 26(a)(2);

WHEREAS the parties have not previously requested any extension of the deadline for making expert disclosures under Rule 26(a)(2);

WHEREAS all other dates set forth in the Scheduling Order would remain unchanged by such a request, including that the parties shall complete any and all expert discovery on or before November 16, 2022;

IT IS ACCORDINGLY STIPULATED AND AGREED that the parties' deadline for making their expert disclosures under Rule 26(a)(2) is extended until October 14, 2022.

Dated: August 23, 2022

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IT IS SO ORDERED this ____ day of _____, 2022

The Hon. Lewis A. Kaplan
United States District Judge